



WHISTLEBLOWING POLICY

Purpose

Nazarene Theological College (NTC or the College) is committed to achieving the highest possible standards of teaching, work and service and the highest possible ethical standards in all of its practices. It aspires to be a learning community reflecting the love of God as Father, Son and Holy Spirit. NTC has a firm commitment to transparency and accountability.

The purpose of this Policy is to encourage employees, students, volunteers, Governors, agency workers and self-employed contractors who have serious concerns about any aspect of NTC's work to come forward and voice those concerns. The Policy outlines procedures to be followed to ensure that concerns can be raised about suspected wrongdoing or malpractice within the College without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

The Whistleblowing Policy is not intended to replace existing procedures relating to personal circumstances e.g. grievance, bullying, harassment etc.

Definition

Whistleblowing' means the reporting by employees, students, volunteers, Governors, agency workers or self-employed contractors of suspected misconduct, illegal acts, unethical acts or failure to act within NTC. Examples include:

- Any activity that may be suspected as criminal
- Any activity that may be suspected as putting health and safety at risk
- Any activity that may be suspected as damaging the environment
- Any activity that may be suspected as breaching NTC's policy on bribery and corruption
- Any failure to comply with legal or regulatory obligations
- Any failure to meet professional requirements
- Any attempt to conceal one or more of these activities

Note that this is not an exhaustive list.

Approach

The College always encourages employees, students, volunteers, Governors, agency workers and self-employed contractors to raise concerns openly, and NTC actively discourages anonymous whistleblowing. Proper investigation may be more difficult or impossible if the College cannot obtain further information from the person who has made the disclosure.

Any concerns should be emailed to whistleblowing@nazarene.ac.uk and this will be received by NTC's Designated Persons, who are the Principal and the Operations Director. The Principal and Operations Director will either appoint the Operations Director to handle the disclosure or appoint another nominated person. If the concern relates to the actions of the Principal and/or Operations Director, a letter should be sent to the Chair of the Governors, Nazarene Theological College, Dene Road, Didsbury, Manchester M20 2GU.

After a concern has been raised under this Policy an initial assessment will be carried out. This initial assessment will consider whether the disclosure falls within the scope of this Policy. If the disclosure falls within the scope of the Policy, a decision will be taken as to next steps, including on whether a formal investigation is necessary.

An investigation will depend on the nature of the matter raised and may involve:

- an internal investigation conducted by an independent senior member of the NTC Leadership Team.

- a paper based exercise by the Operations Director or another nominated person and/or
- referral to an appropriate external person (e.g. police if the matter involves allegations of criminal activity).

The initial assessment may also result in referring the matter to another NTC procedure or determining that the matter has already been dealt with pursuant to an alternative procedure. The person making the disclosure will be informed of the outcome of this assessment in writing.

The College will aim to keep the person who makes the disclosure informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the College from giving the individual specific details of the investigation or any disciplinary action taken as a result. The person making the disclosure should treat any information about the investigation as confidential.

External disclosures

The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing. It is the College's hope that individuals should not find it necessary to disclose their concerns to anyone externally.

If a person is unsure about reporting a concern to anyone external, and is not comfortable in talking to either of the Designated Persons for advice, the College recommends that advice is received from Protect, the independent whistleblowing charity <https://protect-advice.org.uk/>

Protection and support for whistleblowers

It is understandable that those considering making a disclosure are sometimes worried about possible repercussions.

NTC will not tolerate any harassment or victimisation of anyone who makes a disclosure under this Policy (including informal pressures) and will take appropriate action to protect the person who raises a concern in good faith. The College will treat any such behaviour against a whistleblower as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

If an allegation is made in good faith, with the person reasonably believing it to be true, but it is not confirmed by the investigation, the College will recognise the person's concern and will not take any further action.

If, however, an allegation is made frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

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